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September 25, 2013

FCC PS Docket #07-114 Public Comment Submission 445 12th St, S.W. Washington, DC 20554

The Oakland County Michigan 911 PSAP Coordinators Subcommittee represents 23 Public Safety Answering Point (s) which provides emergency 911 services to 1.2 million residents in southeast Michigan. As the Co-Chair of the committee I have been asked to provide comments to the FCC regarding E911 accuracy as identified in Docket #07-114.

In 2011, Oakland County PSAP's received 536,783 911 calls. 76% of those calls were wireless, 6% were VOIP, 18% were landlines.

In 2012, Oakland County PSAP's received 543,254 911 calls. 77% of those calls were wireless, 6% were VOIP, 17% were landlines.

A sample of wireless 911 calls showed that in Oakland County, Michigan we are receiving on average 26% of these calls initially as Phase I only. Upon rebid of Phase I calls we average a 90% return with Phase II. Carriers that are consistently showing 90%+ received as Phase II calls were: Sprint and Verizon. ATT was below 90%.

A sample of wireless 911 calls for accuracy showed that 87% of the calls were accurate based on Phase II longitude and latitude as reported by the carriers. Accuracy was consistent among all carriers.

We believe that an accuracy rating should be reported by the carriers to 911 PSAP"s within the data record as the call is processed and delivered to our dispatchers. We believe that carriers need to be consistent in delivering Phase II data without the need to rebid the call. We also believe that we should be requiring 100% accuracy with call routing as delays in service are caused by the wrong PSAP receiving the initial call.

CENTRAL DISPATCH